



May 25, 2004

Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Amendment of Parts 1, 21, 7, 74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands – WT Docket No. 03-66*

Dear Chairman Powell,

On behalf of the Consortium for School Networking (CoSN) and the International Society for Technology in Education (ISTE), we write to express our deep concern regarding proposals under consideration by the Federal Communications Commission (FCC) that would allow spectrum reserved for educational purposes as part of the Instructional Television Fixed Service ("ITFS") to be sold to commercial entities, or would otherwise reduce the total amount of spectrum allocated to ITFS. Please vote against this proposal and, most immediately, delay its consideration by the Commission so that further discussions between educators and the FCC can continue.

CoSN and ISTE are two of the most prominent, non-profit, member based organizations that advocate for the use of the Internet and telecommunications to improve K-12 learning. As leaders in the education technology arena, we are acutely aware of the need preserve the ITFS spectrum so that educational entities can fully utilize the resources at their disposal to improve academic achievement. Activities made possible by the ITFS spectrum, including distance learning programs, video on-demand services to classrooms, and wireless services are critical tools in enhancing student learning, especially for those students in rural communities that rely heavily on ITFS for distance education programming.

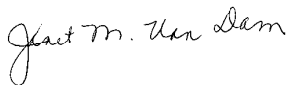
Currently more than 1,200 educational entities hold nearly 2,200 ITFS licenses, reaching millions of students across the country. As a result, any FCC rule change that would commercialize the ITFS band would have a substantial adverse impact on our education system and on student achievement.

While we welcome efforts to improve the use of these bands for educational purposes and agree that the Commission should consider new ways to facilitate the rollout of high

speed services to students, we remain deeply troubled by plans that allow the outright sale of ITFS spectrum to private individuals or for-profit companies. In our view, such a plan would unfairly limit the ability of educational institutions to control this spectrum at the very time that it promises to become a more effective tool to serve students throughout the nation.

Accordingly, as consideration of this item continues, we hope that you will act to reaffirm limitations that reserve ITFS licenses for educational use only, to prevent any reallocation that would reduce the total amount of ITFS spectrum, and to ensure that the desires of commercial interests are not put before the public's interest in using this asset to promote educational advancement. In order to alleviate the current situation, we urge the FCC to delay full Commission consideration of the draft rules to allow discussion between the parties to continue.

Sincerely,



Jan Van Dam
President, ISTE



Bob Moore
Chair, CoSN

cc: Commissioner Kathleen Abernathy
Commissioner Michael Copps
Commissioner Kevin Martin
Commissioner Jonathan Adelstein